

Dan R. Waite (SBN 4078)
DWaite@lrrc.com
Brian D. Blakley (SBN 13074)
BBlakley@lrrc.com
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996
Tel: 702.949.8200
Fax: 702.949.8398

Attorneys for Defendant The Hertz Corporation

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KEITH FRICKE,

Plaintiff,

vs.

THE HERTZ CORPORATION,

Defendant.

Case No.: 2:20-cv-00038-RFB-VCF

**STIPULATION AND ORDER FOR AN
EXTENSION OF TIME FOR
DEFENDANT TO FILE ITS REPLY IN
SUPPORT OF ITS MOTION TO
DISMISS AND ITS RESPONSE TO THE
MOTION FOR LEAVE TO AMEND**

[FIRST REQUEST]

Plaintiff Keith Fricke (“Plaintiff”) and Defendant The Hertz Corporation (“Defendant” and together with Plaintiff as the “parties”), submit this stipulation and order for an extension of time for Defendant to file its reply in support of its motion to dismiss the first amended complaint, (ECF No. 10), and its response to Plaintiff’s motion for leave to file a second amended complaint, (ECF No. 15).

Plaintiff’s original complaint was served on December 9, 2019 and removed on January 8, 2020. (*See* ECF No. 1). Defendant moved to dismiss the original complaint on January 15, (ECF No. 7), and Plaintiff filed his first amended complaint on January 29, (ECF No. 9). On February 12, Defendant filed its motion to dismiss the first amended complaint, (ECF No. 10), and Plaintiff filed his response on March 20, (ECF No. 14). The same day, Plaintiff also filed a motion for leave to file a second amended complaint. (ECF No. 15).

Given the seven-day deadline for reply briefs, LR 7-2(b), Defendant's reply in support of the motion to dismiss is presently due on March 27, and its response to the motion to amend is presently due on April 3.

Due to issues related to the ongoing COVID-19 outbreak, the declaration of a national emergency, and related state declarations, Defendant requested a modest extension for these deadlines, and Plaintiff agreed to stipulate to that request. Specifically, the parties stipulate to the following extension:

- Defendant's reply in support of the motion to dismiss the first amended complaint shall be due on **April 24, 2020**
- Defendant's response to the motion for leave to file the second amended complaint shall be due on **April 24, 2020**

This is the first request for an extension of these deadlines, and it is made in good faith and not for the purposes of delay.

Dated this 26th day of March, 2020.

KIND LAW

By: /s/ Michael Kind
Michael Kind, Esq. (SBN 13903)
8860 South Maryland Parkway, Suite 106
Las Vegas, NV 89123

Attorney for Plaintiff Keith Fricke

Dated this 26th day of March, 2020.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Brian
Blakley
Dan R. Waite (SBN 4078)
Brian D. Blakley (SBN 13074)
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

Attorneys for The Hertz Corporation

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 27th day of March, 2020.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

The above stipulation is approved and **SO ORDERED.**

UNITED STATES JUDGE

DATED:

Submitted by:

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Brian Blakley
Dan R. Waite (SBN 4078)
Brian D. Blakley (SBN 13074)
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

Attorneys for The Hertz Corporation